

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

<p>ECOFACTOR, INC.,</p> <p style="text-align:center">Plaintiff,</p> <p style="text-align:center">v.</p> <p>GOOGLE LLC,</p> <p style="text-align:center">Defendant.</p>	<p>Civil Action No. 6:20-cv-00075 (ADA)</p>
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**JOINT NOTICE IDENTIFYING REMAINING OBJECTIONS TO PRETRIAL  
DISCLOSURES AND DISPUTES ON MOTIONS IN LIMINE**

Pursuant to the Court’s Order Governing Proceedings and the parties’ Joint Motion to Amend the Scheduling Order (Dkt. No. 172), Plaintiff EcoFactor, Inc. (“EcoFactor”) and Defendant Google LLC (“Google”) hereby provide this joint notice identifying remaining objections to pretrial disclosures and disputes on motions in limine. On January 7, 2022, the parties filed the Joint Pretrial Order identifying disputed motions in *limine*. *See* Dkt. No. 169. The parties also filed various exhibits to the pretrial order and objections thereto.

Since the filing of the Joint Pretrial Order, the parties have provided a joint juror questionnaire and joint voir dire questions to the Court, resolving the parties’ differences as to those documents. *See e.g.*, Dkt. No. 169, Exs. F-1, F-2, F-3, and F-4. The parties have continued to meet and confer regarding verdict forms and will submit a combined joint proposal to the Court tomorrow with any remaining disputes and objections noted in the submission. *See e.g.*, Dkt. No. 169, Exs. G-1 and G-2. The other objections to pretrial disclosures and the disputed motions in limine as identified in the parties’ Joint Pretrial Order remain outstanding.

Respectfully submitted,

Dated: January 20, 2022

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on January 20, 2022, the foregoing was served on all counsel of record by e-mail.

*/s/ Reza Mirzaie*  
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